

FEB 10 2021

UNITED STATES DISTRICT COURT

for the

Western District of Virginia

JULIA C. DUDLEY, CLERK

BY: *[Signature]*

DEPUTY CLERK

United States of America

v.

ALLEN CEDRIC TAYLOR

Case No. 1:21m)31

*Defendant(s)*

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 12, 2021 in the county of Tazewell in the  
Western District of Virginia, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 USC 115(a)(1)(B)	Influencing, impeding, or retaliating against a Federal official.

This criminal complaint is based on these facts:

See attached Affidavit

☒ Continued on the attached sheet.

*Neil A. Schimke*  
*Complainant's signature*

Neil A. Schimke, FBI Special Agent

*Printed name and title*

Sworn to before me and signed *telephonically.* in my presence.

Date: 02/03/2021

*Pamela Meade Sargent*  
*Judge's signature*

City and state: Abingdon, Virginia

Pamela Meade Sargent, U.S. Magistrate Judge

*Printed name and title*

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF VIRGINIA  
ABINGDON DIVISION

IN THE MATTER OF THE ARREST OF:  
ALLEN CEDRIC TAYLOR

Case No. \_\_\_\_\_

**AFFIDAVIT IN SUPPORT OF CRIMINAL  
COMPLAINT AND ARREST WARRANT**

I, Neil A. Schimke, a Special Agent with the Federal Bureau of Investigation, Richmond Division, Bristol Resident Agency, having been duly sworn, depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am an investigative law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 3052, which specifically authorizes FBI Special Agents, and officials of the FBI, to make arrests, carry firearms, and serve warrants. Title 18, United States Code, Section 3107, empowers FBI Special Agents and officials to make seizures under warrant for violation of federal statutes.
2. I have been employed as a Special Agent with the FBI for approximately 7 years. I am currently assigned to the Bristol Resident Agency located in Bristol, Virginia. Prior to working in Bristol, I was assigned to the Laredo Resident Agency located in Laredo, Texas, and was the coordinator for the Joint Terrorism Task Force, an FBI Task Force, investigating international terrorism and domestic terrorism. While assigned to Laredo I also investigated Mexican drug trafficking organizations, violent assaults against federal agents, kidnappings (domestic and international) and worked various counterintelligence investigations. Prior to working in Laredo I was assigned to the Orange County Resident Agency in Orange, California, where I was the case agent on multiple terrorism investigations, to include domestic terrorism investigations involving Weapons of Mass Destruction, explosive devices and international terrorism investigations of Homegrown Violent Extremists. I have taken part in numerous federal, state, and local investigations concerning violations including international and domestic terrorism, document and identity fraud, financial fraud, cybercrimes, public corruption, controlled substance violations, kidnappings, violent crimes against children, espionage, and firearms offenses. Additionally, I deployed overseas for the FBI to investigate international terrorism in both the Philippines and Jordan.
3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is

intended to show simply that there is sufficient probable cause for the requested warrant and does not set forth all my knowledge about this matter.

4. Based on the facts as set forth in this affidavit, there is probable cause to believe ALLEN CEDRIC TAYLOR has violated 18 U.S.C. § 115(a)(1)(B) by threatening to assault a United States official, to wit: a sitting United States Senator, with the intent to intimidate or interfere with such official, while engaged in the performance of his official duties.

#### STATEMENT OF PROBABLE CAUSE

5. On January 12, 2021, at approximately 12:40 p.m., Ms. Nicole Meservey, Staff Assistant to United States Senator Mark R. Warner (Senator Warner), received a telephone call threatening harm to Senator Warner if he voted to impeach President Trump. Ms. Meservey, who was teleworking at the time she received the call, took contemporaneous notes as to what was said during the call. After receiving the telephone call, Ms. Meservey conferred with a colleague about the nature of the threat before determining that the threat warranted referral to the United States Capitol police.
6. On January 12, 2021, at approximately 2:26 p.m., Ms. Meservey emailed the United States Capitol Police Threat Assessments and reported the call. In her email to the United States Capitol Police, Ms. Meservey relayed:

"Today around 12:40PM we received a phone call from (704) 412-2860. This caller began by praising last week's rioters and continued to say the following "we are taking this country back", "Warner and the rest of you are gonna pay", and "we have the weapons for this". He continued by stating that if Senator Warner supports impeachment he should "watch out".

I was unfortunately not able to collect further contact information.

Please feel free to contact me directly at 4-1715 or via this email address."

7. During initial investigative activity, Experian records indicated telephone number 704-412-2860 resolved back to an Allen Cedric Taylor, with a residential address of 3403 Blackwell Lane, Tannersville, Virginia, 24377, an address located in the Western District of Virginia.
8. Database checks confirmed Taylor's association with phone number 704-412-2860 and provided a Date of Birth of (DOB) 1959, Social Security Number (SSN) xxx-xx-2248.
9. On January 26, 2021, surveillance confirmed the residence of Allen Cedric Taylor as 3403 Blackwell Lane, Tannersville, Virginia, 24377. Your affiant spoke with a local





postman who serviced 3403 Blackwell Lane and was told 3403 was the residence of Allen Cedric Taylor.

10. Based on the facts as set forth in this affidavit, there is probable cause to believe that Allen Cedric Taylor committed violations of 18 U.S.C. § 115(a)(1)(B).

#### **JURISDICTION**

11. This Court has jurisdiction to issue the requested warrant because it is "a court of competent jurisdiction" as defined by 18 U.S.C. § 2711. Specifically, the Court is "a district court of the United States . . . that— has jurisdiction over the offense being investigated." 18 U.S.C. § 2711(3)(A)(i).

#### **FACTS SUPPORTING PROBABLE CAUSE**

12. Your affiant interviewed Ms. Meservey who explained that at the time she received the telephone call, she was tele-working from her residence. Ms. Meservey explained that during COVID, Senator Warner's office calls are forwarded to Ms. Meservey and a colleague of hers' who both work remotely. Ms. Meservey also explained that while she answers telephone calls, she keeps open on her computer a blank email to allow her to take notes as may be necessary.
13. Ms. Meservey explained that she took contemporaneous notes from the telephone call she received on January 12, 2021. Ms. Meservey explained that she then conferred with her colleague to assess whether the threatening language merited reporting to law enforcement. After discussing with her colleague, Ms. Meservey determined that in light of the recent mob attacks on the United States Capitol, the threat of violence in this telephone call warranted reporting to law enforcement.
14. On January 27, 2021, your affiant interviewed Mr. Taylor at his home in Tannersville, Virginia. The interview was non-custodial, and Mr. Taylor was not advised of his Miranda rights. Mr. Taylor agreed to speak with law enforcement, and explained the following:
  - a. Mr. Taylor lived alone for several months and rented his home from his former domestic partner.
  - b. Mr. Taylor confirmed that his telephone number is 704-412-2860. Mr. Taylor explained that nobody other than Mr. Taylor used his cellular phone on January 12, 2021.
  - c. Mr. Taylor admitted to calling Senator Warner's office on January 12, 2021, from his house in Tazewell county, located in the Western District of Virginia. Mr. Taylor admitted to making several of the statements that were reported by Ms. Meservey to

the United States Capitol Police,

d. Mr. Taylor explained that he had called Senator Warner's office on January 12, 2021, because, "The Mother fucker is a goddamn democrat" and "I'm not surprised the FBI is here to talk to me." Mr. Taylor further noted, "Democrats are communist bastards and we suffered under the nigger Obama for eight years."

e. Mr. Taylor initially claimed that he never said, "Senator Warner would pay" and initially denied saying "he had weapons for this." Mr. Taylor also stated that he never said, "Senator Warner should watch out if he voted on impeaching former President Trump" and "I would never go to the Capitol."

f. When asked to further clarify his statements, Mr. Taylor commented, "they are pushing the people who voted for Trump against the wall and we have guns" and "Senator Warner is alienating people around here and we have guns."

g. Mr. Taylor confirmed with your affiant that on the phone call to Senator Warner's office, he said "We are taking this country back." Mr. Taylor clarified that what he meant by this statement was that he is confused by the changes being made in this country.

h. Despite his initial denials, Mr. Taylor made statements that corroborated Ms. Meserve's report. Mr. Taylor again stated he never said, "Senator Warner was going to pay if he voted on impeaching former President Trump", but then stated "...if I did say it, my medication must not be working."

i. Mr. Taylor expressed that he believed the election was rigged and "they need to be ready." Mr. Taylor discussed the Great Reset was coming and believed China owned the World Health Organization (WHO). Mr. Taylor explained, "a civil war is coming and this is how the Tea Party started" and "Trump exposed Social Media as being corrupt." Mr. Taylor further commented, "Obama is the most evil human ever."

j. Mr. Taylor also noted that he "could not believe the little bitch on the phone called the Capitol Police to report him" and described the phone call as being calm. Mr. Taylor claimed he thanked the girl on the phone for speaking with him several times. Mr. Taylor apologized to the staffer he spoke with on January 12, 2021 and felt the phone call was peaceful but now thinks he should not have mentioned guns. Taylor noted, "I always take things too far, I'm not quite right."

### CONCLUSION

15. Based on the foregoing, I request this Court issue the proposed arrest warrant. The undersigned submits that there is probable cause to believe ALLEN CEDRIC TAYLOR has violated 18 U.S.C. § 115(a)(1)(B) by threatening to assault a United States official, to

wit: a sitting United States Senator, with the intent to intimidate or interfere with such official, while engaged in the performance of his official duties.

16. I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. Executed on February 9, 2021, at Abingdon, Virginia.

*Neil A. Schimke*

Neil A. Schimke, Special Agent  
Federal Bureau of Investigation

SWORN AND SUBSCRIBED TO BEFORE ME *telephonically*  
THIS 9<sup>th</sup> DAY OF FEBRUARY 2021

*Pamela Meade Sargent*

HONORABLE JUDGE PAMELA MEADE SARGENT  
UNITED STATES DISTRICT COURT IN THE  
WESTERN DISTRICT OF VIRGINIA